

EXHIBIT A



BRENDA D. FORMAN
CLERK OF THE COURTS
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| |

Menu

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(/GeneralInformation/Miscellaneous#RemoteHearingsbyZoom..

Case Detail - Public

Print

Jane Doe Plaintiff vs. Bendjy Charles, et al Defendant

Broward County Case Number: CACE22015601
State Reporting Number: 062022CA015601AXXXCE
Court Type: Civil
Case Type: Neg - Negligence Other
Incident Date: N/A
Filing Date: 10/19/2022
Court Location: Central Courthouse
Case Status: Pending
Magistrate Id / Name: N/A
Judge ID / Name: 04 Perlman, Sandra

- Party(ies)



Total: 4

Party Type	Party Name	Address	Attorneys / Address ★ Denotes Lead Attorney
Plaintiff	Doe, Jane		

Party Type	Party Name	Address	Attorneys / Address ★ Denotes Lead Attorney
Defendant	Charles, Bendjy		
Defendant	Romelus, Michelson		
Defendant	Fenix Internet LLC		

Disposition(s)			Total: 0
Date	Statistical Closure(s)		
Date	Disposition(s)	View	Page(s)

Event(s) & Document(s)				Total: 9
Date	Description	Additional Text	View	Pages
11/14/2022	Notice of Unavailability			2
10/21/2022	eSummons Issuance	MICHELSON ROMELUS		3
10/21/2022	eSummons Issuance	BENDJY CHARLES		3
10/21/2022	eSummons Issuance	FENIX INTERNET, LLC		2
10/19/2022	Per AOSC20-23 Amd12, Case is determined General			
10/19/2022	Civil Cover Sheet	Amount: \$100,001.00		3
10/19/2022	Complaint (eFiled)	Party: Plaintiff Doe, Jane		11

Date	Description	Additional Text	View	Pages
10/19/2022	Notice of Filing Designation of Emailing Addresses	tri@kulaw.com Party: <i>Plaintiff</i> Doe, Jane		2
10/19/2022	Clerk's Certificate of Compliance W-2020-73CIV/2020-74-UFC	NONE		2

-

Hearing(s)

Total: 0

There is no Disposition information available for this case.

-

Related Case(s)

Total: 0

There is no related case information available for this case.

Brenda D. Forman

Clerk of Court

Broward County
17th Judicial Circuit

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GLOSSARY OF TERMS (HTTPS://WWW.BROWARDCLERK.ORG//WEB2/CASESEARCHECA/GLOSSARY/)	>

Main Courthouse Location

201 SE 6th Street
Fort Lauderdale
Florida, US 33301
Phone: (954) 831-6565

PUBLIC RECORDS CUSTODIAN (/GENERALINFORMATION/MISCELLANEOUS#PUBLICRECORDSCUSTODIAN) > *PURSUANT TO 119.12(2), F.S.*

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IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO.:

JUDGE:

JANE DOE,

Plaintiff,

vs.

FENIX INTERNET, LLC,
MICHELSON ROMELUS, and
BENDJY CHARLES,

Defendants.

PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, JANE DOE, hereby sues Defendant BENDJY CHARLES, Defendant MICHELSON ROMELUS, and Defendant FENIX INTERNET, LLC ("FIL") and allege as follows:

JURISDICTION, PARTIES, & VENUE

1. This is a personal injury action for damages in excess of Thirty Thousand Dollars (\$30,000.00).
2. Plaintiff, Jane Doe, resides in Broward County, Florida, is over the age of 18 and is otherwise *sui juris*.
3. At all material times, Defendant Bendjy Charles lived in Miami-Dade County, Florida, is over the age of 18 and is otherwise *sui juris*.
4. At all material times, Defendant Michelson Romelus lived in Miami-Dade County, Florida, is over the age of 18 and is otherwise *sui juris*.

5. On or about April 28, 2022, Defendant Bendjy Charles and Defendant Michelson Romelus raped Plaintiff.

6. Defendant FENIX INTERNET, LLC is a corporation registered in Wilmington, Delaware.

7. At this time, given the nature of the facts which are the subject of this case, Plaintiff will publicly be referred to as (“Jane Doe”).

GENERAL ALLEGATIONS

8. Defendant FENIX INTERNET, LLC owns and operates OnlyFans.com (“OnlyFans”), a website that allows users to pay for pornographic content uploaded by individual content creators and engages in profit sharing with content creators.

9. Defendant Michelson Romelus is a verified OnlyFans content creator and internet personality who uploads pornographic content for sale under the username “@michelsonro” on OnlyFans.

10. On or about April 28, 2022, Defendant Bendjy Charles, portraying himself as the alias “Jean”, and Plaintiff met on a dating app and decided to meet in person. Defendant Bendjy Charles and Defendant Michelson Romelus picked up Plaintiff at her home and then went to Defendant Bendjy Charles’ apartment and consumed alcoholic beverages.

11. At some point during the evening, Defendant Michelson Romelus began to touch Plaintiff and refused to stop even when Plaintiff tried to push him off of her. During this time, Defendant Bendjy Charles entered the room and attempted to rape Plaintiff from behind. Plaintiff told both Defendants to stop and Defendant Michelson Romelus then slapped Plaintiff.

12. Defendants filmed each other on video while they forcibly raped and sodomized Plaintiff.

13. Plaintiff tried to put her clothes back on and leave when Defendant Michelson Romelus followed her into the living room and again forcibly raped and sodomized the Plaintiff while continuing to film. Defendant Bendjy Charles watched and then also began to forcibly rape and sodomize the Plaintiff again.

14. Defendants Bendjy Charles and Michelson Romelus then dropped Plaintiff off at her friend's warehouse and her friend then took her home. On the ride home, Plaintiff became inconsolable, and her friend called the police out of fear that she would be a danger to herself due to her distress.

15. On or about May 2, 2022, Plaintiff checked herself into Memorial Hospital Psychiatric Ward. Thereafter Plaintiff checked herself into rehab and group therapy facility where she stayed for 6 weeks.

16. Defendant Michelson Romelus subsequently edited and uploaded the video footage of Plaintiff's rape to OnlyFans and began to sell the footage on OnlyFans as a part of a monthly subscription package. The video depicts an edited compilation of Defendant Bendjy Charles and Defendant Michelson Romelus raping Plaintiff in several areas of the apartment while Plaintiff cries and screams.

17. Defendant FLI profited from the sale of the video, taking approximately twenty percent of the subscription fee from Defendant Michelson Romelus' OnlyFans account and further contributed to the illegal commercial venture by failing to enact any safeguards to remove trafficked material from its website.

COUNT I

Benefitting from a Sex Trafficking Venture in Violation of the Trafficking Victims Protection Reauthorization Act, 18 U.S.C. §§ 1591 and 1595

Fenix Internet, LLC

18. Plaintiff re-alleges and reaffirms each allegation contained in Paragraphs 1 through 17 of this Complaint as though fully alleged herein and further allege:

19. The Trafficking Victims Protection Act was originally passed by Congress in 2000 to comprehensively penalize the full range of human trafficking offenses, including offenses where “means of force, threats of force, fraud, coercion ... or any combination of such means [were] used to cause the person to engage in a commercial sex act.” 18 U.S.C. § 1591(a)(2)

20. In 2003, Congress authorized the Trafficking Victims Protection Reauthorization Act (“TVPRA”) which created a civil cause of action codified in 18 U.S.C. § 1595(a) for trafficking victims to pursue civil claims against perpetrators of trafficking or those who knowingly benefit financially from trafficking.

21. 18 U.S.C. § 1591 provides for a civil action against the “perpetrator (or whoever knowingly benefits, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act in violation of this chapter)” for violations of, *inter alia*, 18 U.S.C. §§ 1595 and 1593(A).

22. In 2018, the Allow States and Victims to Fight Online Sex Trafficking Act of 2017 (FOSTA) was passed which removed immunity for civil claims under Section 230 of the Communications Decency Act of 1996 (CDA) for websites that knowingly assist, support, or facilitate third-party advertising activities that violate federal sex trafficking law, including 18 U.S.C. §§ 1591, 1595. The website need not have actual knowledge of the sex trafficking at issue, as long as the provider has constructive knowledge of the trafficking. 18 U.S.C.A. §§ 1591, 1595; Communications Act of 1934 § 230, 47 U.S.C.A. §§ 230, 230(e)(5)(A).

23. 18 U.S.C. § 1591(3) defines a commercial sex act as any sex act, on account of which anything of value is given to or received by any person.

24. Defendants Bendjy Charles and Michelson Romelus violated 18 U.S.C. § 1591, 1595 by causing Plaintiff to engage in a commercial sex act by forcibly raping and sodomizing her after slapping and restraining her to force and coerce Plaintiff into the act pursuant to 18 U.S.C. § 1591(2)(A) and then publishing the video footage on OnlyFans for a commercial profit.

25. Defendant FLI violated 18 U.S.C. § 1595(a) by knowingly benefitting from profit-sharing in a commercial venture by anonymizing web traffic and utilizing a paywall to make it easier for individuals to sell illegal pornographic material.

26. FLI participated in this venture by knowingly facilitating an environment for illegal content publishing, such as the video of Plaintiff's rape, and engaging in profit-sharing with Defendant Michelson Romelus by aiding in the sale of the video and verifying Defendant Michelson Romelus' OnlyFans account to aid in the distribution of the material.

27. FLI had constructive knowledge that its website OnlyFans affords individuals the opportunity to post and profit from illegal pornographic and trafficked content and does not take reasonable measures to prevent these occurrences. 18 U.S.C.A. §§ 1591, 1595; 47 U.S.C.A. §§ 230, 230(e)(5)(A). FLI profits from illegal activities through their fee-based subscription services, selling advertisements, and by monetizing user data.

28. FLI benefitted from the sale of the Plaintiff's rape video by receiving twenty percent of the sale proceeds and continuing to benefit from occurrences with those similarly situated and encouraging the creation of such content by not putting forth any safeguards to prevent this content from being sold on their website in violation of 18 U.S.C.A. §§ 1591, 1595.

WHEREFORE, Plaintiff Jane Doe demands judgment against Defendant FLI, Defendant Bendjy Charles, and Defendant Michelson Romelus for damages in excess of Thirty Thousand Dollars (\$30,000.00) together with interest and costs, which they pray for in addition thereto.

COUNT II

Battery Against Bendjy Charles

29. Plaintiff re-alleges and reaffirms each allegation contained in Paragraphs 1 through 17 of this Complaint as though fully alleged herein and further allege:

30. On or about April 28, 2022, Defendant Bendjy Charles committed an intentional and un-permitted sexual contact on Plaintiff Jane Doe in that Defendant Bendjy Charles intentionally, knowingly, willfully, and maliciously touched, fondled, raped and otherwise sexually assaulted the aforesaid Jane Doe's person, without her permission, consent and/or authorization.

31. As a direct, proximate and foreseeable result of the aforementioned unpermitted contact by Defendant Bendjy Charles, Plaintiff suffered severe psychological and/or emotional distress, physical injury, fright, fear, shock, pain, suffering, trauma, humiliation and was thereby rendered sick, sore, lame, and otherwise disabled or, in the alternative, the foregoing injuries thereby caused or contributed to cause an aggravation of a previous existing defect or infirmity; and as a direct result thereof, Plaintiff Jane Doe has suffered injuries resulting in pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life, and inconvenience all of which conditions are permanent and continuing in nature.

32. As a further direct and proximate result of the above-mentioned unpermitted contact, Plaintiff Jane Doe has in the past undergone and will in the future undergo painful and extensive medical care and treatment, and has in the past incurred, and will in the future incur, medical bills and expenses attendant to the injuries, as aforesaid.

WHEREFORE, Plaintiff Jane Doe demands judgment against Defendant Bendjy Charles for damages in excess of Thirty Thousand Dollars (\$30,000.00) together with interest and costs, which they pray for in addition thereto.

COUNT III

Intentional Infliction of Emotional Distress Against Bendjy Charles

33. Plaintiff re-alleges and reaffirms each allegation contained in Paragraphs 1 through 17 of this Complaint as though fully alleged herein and further allege:

34. On or about April 28, 2022, Defendant Bendjy Charles committed intentional and un-permitted sexual contact on Plaintiff Jane Doe in that Defendant Bendjy Charles intentionally, knowingly, willfully, and maliciously touched, fondled, raped and otherwise sexually assaulted the aforesaid Jane Doe's person, without her permission, consent and/or authorization.

35. The aforementioned conduct by Defendant Bendjy Charles toward the person and body of Plaintiff Jane Doe was extreme and outrageous and was done with total and utter disregard for the rights, safety and well-being of the person and body of Plaintiff Jane Doe so as to be beyond all bounds of decency.

36. Defendant Bendjy Charles knowingly, maliciously, wrongfully, intentionally and without justification, did interfere with Plaintiff, Jane Doe's life, safety, well-being, in a manner regarded as outrageous and intolerable in a civilized community, and was shocking, and atrocious.

37. As a direct, proximate and foreseeable result of Defendant Bendjy Charles willful and wanton conduct, Plaintiff Jane Doe suffered severe psychological and/or emotional distress, physical injury, fright, fear, shock, pain, suffering, trauma, humiliation and was thereby rendered sick, sore, lame, and otherwise disabled or, in the alternative, the foregoing injuries thereby caused or contributed to cause an aggravation of a previous existing defect or infirmity; and as a direct result thereof, Plaintiff Jane Doe has suffered injuries resulting in pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life, and inconvenience all of which conditions are permanent and continuing in nature.

38. As a further direct and/or proximate result of the aforementioned willful and wanton conduct and/or actions of Defendant Bendjy Charles, Plaintiff Jane Doe has in the past undergone and will in the future undergo painful and extensive medical care and treatment, and has in the past incurred, and will in the future incur, medical bills and expenses attendant to the injuries, as aforesaid.

COUNT IV

Battery Against Michelson Romelus

39. Plaintiff re-alleges and reaffirms each allegation contained in Paragraphs 1 through 17 of this Complaint as though fully alleged herein and further allege:

40. On or about April 28, 2022, Defendant Michelson Romelus committed an intentional and un-permitted sexual contact on Plaintiff Jane Doe in that Defendant Michelson Romelus intentionally, knowingly, willfully, and maliciously touched, fondled, raped and otherwise sexually assaulted the aforesaid Jane Doe's person, without her permission, consent and/or authorization.

41. As a direct, proximate and foreseeable result of the aforementioned unpermitted contact by Defendant Michelson Romelus, Plaintiff suffered severe psychological and/or emotional distress, physical injury, fright, fear, shock, pain, suffering, trauma, humiliation and was thereby rendered sick, sore, lame, and otherwise disabled or, in the alternative, the foregoing injuries thereby caused or contributed to cause an aggravation of a previous existing defect or infirmity; and as a direct result thereof, Plaintiff Jane Doe has suffered injuries resulting in pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life, and inconvenience all of which conditions are permanent and continuing in nature.

42. As a further direct and proximate result of the above-mentioned unpermitted contact, Plaintiff Jane Doe has in the past undergone and will in the future undergo painful and

extensive medical care and treatment, and has in the past incurred, and will in the future incur, medical bills and expenses attendant to the injuries, as aforesaid.

WHEREFORE, Plaintiff Jane Doe demands judgment against Defendant Michelson Romelus for damages in excess of Thirty Thousand Dollars (\$30,000.00) together with interest and costs, which they pray for in addition thereto.

COUNT V

Intentional Infliction of Emotional Distress Against Michelson Romelus

43. Plaintiff re-alleges and reaffirms each allegation contained in Paragraphs 1 through 17 of this Complaint as though fully alleged herein and further allege:

44. On or about April 28, 2022, Defendant Michelson Romelus committed intentional and un-permitted sexual contact on Plaintiff Jane Doe in that Defendant Michelson Romelus intentionally, knowingly, willfully, and maliciously touched, fondled, raped and otherwise sexually assaulted the aforesaid Jane Doe's person, without her permission, consent and/or authorization.

45. The aforementioned conduct by Defendant Michelson Romelus toward the person and body of Plaintiff Jane Doe was extreme and outrageous and was done with total and utter disregard for the rights, safety and well-being of the person and body of Plaintiff Jane Doe so as to be beyond all bounds of decency.

46. Defendant Michelson Romelus knowingly, maliciously, wrongfully, intentionally and without justification, did interfere with Plaintiff, Jane Doe's life, safety, well-being, in a manner regarded as outrageous and intolerable in a civilized community, and was shocking, and atrocious.

47. As a direct, proximate and foreseeable result of Defendant Michelson Romelus' willful and wanton conduct, Plaintiff Jane Doe suffered severe psychological and/or emotional

distress, physical injury, fright, fear, shock, pain, suffering, trauma, humiliation and was thereby rendered sick, sore, lame, and otherwise disabled or, in the alternative, the foregoing injuries thereby caused or contributed to cause an aggravation of a previous existing defect or infirmity; and as a direct result thereof, Plaintiff Jane Doe has suffered injuries resulting in pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life, and inconvenience all of which conditions are permanent and continuing in nature.

48. As a further direct and/or proximate result of the aforementioned willful and wanton conduct and/or actions of Defendant Michelson Romelus, Plaintiff Jane Doe has in the past undergone and will in the future undergo painful and extensive medical care and treatment, and has in the past incurred, and will in the future incur, medical bills and expenses attendant to the injuries, as aforesaid.

WHEREFORE, Plaintiff Jane Doe demands judgment against Defendant Michelson Romelus for damages in excess of Thirty Thousand Dollars (\$30,000.00) together with interest and costs, which they pray for in addition thereto.

DEMAND FOR JURY TRIAL

Plaintiffs JANE DOE hereby demands a trial by jury of all issues triable as a matter of right.

Dated: October 19, 2022.

Kelley | Uustal
Attorneys for Plaintiff
500 North Federal Highway, Suite 200
Fort Lauderdale, Florida 33301
Telephone: (954) 522-6601
Facsimile: (954) 522-6608

By: /s/ Todd R. Falzone, Esq.
Todd R. Falzone, Esquire, Esq.
Florida Bar No. 0975184

TRF/da

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FORM 1.997. CIVIL COVER SHEET

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE CIRCUIT/COUNTY COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

Jane Doe
Plaintiff

Case # _____
Judge _____

vs.

Bendjy Charles, Michelson Romelus, Fenix Internet LLC
Defendant

II. AMOUNT OF CLAIM

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- ☐ \$8,000 or less
☐ \$8,001 - \$30,000
☐ \$30,001- \$50,000
☐ \$50,001- \$75,000
☐ \$75,001 - \$100,000
☒ over \$100,000.00

III. TYPE OF CASE (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

CIRCUIT CIVIL

- ☐ Condominium
- ☐ Contracts and indebtedness
- ☐ Eminent domain
- ☐ Auto negligence
- ☒ Negligence—other
 - ☐ Business governance
 - ☒ Business torts
 - ☐ Environmental/Toxic tort
 - ☐ Third party indemnification
 - ☐ Construction defect
 - ☐ Mass tort
 - ☐ Negligent security
 - ☐ Nursing home negligence
 - ☐ Premises liability—commercial
 - ☐ Premises liability—residential
- ☐ Products liability
- ☐ Real Property/Mortgage foreclosure
 - ☐ Commercial foreclosure
 - ☐ Homestead residential foreclosure
 - ☐ Non-homestead residential foreclosure
 - ☐ Other real property actions
- ☐ Professional malpractice
 - ☐ Malpractice—business
 - ☐ Malpractice—medical
 - ☐ Malpractice—other professional
- ☐ Other
 - ☐ Antitrust/Trade regulation
 - ☐ Business transactions
 - ☐ Constitutional challenge—statute or ordinance
 - ☐ Constitutional challenge—proposed amendment
 - ☐ Corporate trusts
 - ☐ Discrimination—employment or other
 - ☐ Insurance claims
 - ☐ Intellectual property
 - ☐ Libel/Slander
 - ☐ Shareholder derivative action
 - ☐ Securities litigation
 - ☐ Trade secrets
 - ☐ Trust litigation

COUNTY CIVIL

- ☐ Small Claims up to \$8,000
- ☐ Civil
- ☐ Real property/Mortgage foreclosure

- ☐ Replevins
- ☐ Evictions
 - ☐ Residential Evictions
 - ☐ Non-residential Evictions
- ☐ Other civil (non-monetary)

COMPLEX BUSINESS COURT

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes ☐ No ☒

IV. REMEDIES SOUGHT (check all that apply):

- ☒ Monetary;
- ☐ Nonmonetary declaratory or injunctive relief;
- ☐ Punitive

V. NUMBER OF CAUSES OF ACTION: []
(Specify)

5

VI. IS THIS CASE A CLASS ACTION LAWSUIT?

- ☐ yes
- ☒ no

VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- ☒ no
- ☐ yes If "yes," list all related cases by name, case number, and court.

VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- ☒ yes
- ☐ no

IX. DOES THIS CASE INVOLVE ALLEGATIONS OF SEXUAL ABUSE?

- ☒ yes
- ☐ no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Todd R. Falzone Esquire
Attorney or party

Fla. Bar # 975184
(Bar # if attorney)

Todd R. Falzone Esquire
(type or print name)

10/19/2022
Date

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN
AND FOR BROWARD COUNTY, FLORIDA

Jane Doe

Plaintiff

Case No: 22-15601

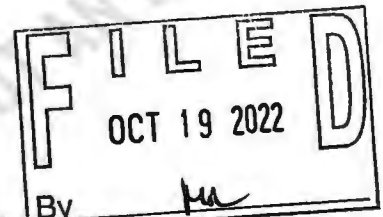
Judge Division: 04

VS

Bendjy Charles,

Defendant

CLERK'S CERTIFICATE OF COMPLIANCE



I hereby certify that pursuant to Administrative Order, No. 2020-73CIV/2020-74-UFC:
"ADMINISTRATIVE ORDER DIRECTING CLERK OF COURTS WITH REGARD TO
DISMISSED CIVIL OR FAMILY CASES",

The Clerk has conducted a search for all previous existing civil cases related to
these two parties.

Listed below are all the aforementioned related cases: NONE

Brenda D. Forman
Circuit and County Courts

By: [signature]

Deputy Clerk

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO.:

JUDGE:

JANE DOE,

Plaintiff,

vs.

FENIX INTERNET, LLC,
MICHELSON ROMELUS, and
BENDJY CHARLES,

Defendants.

NOTICE OF COMPLIANCE WITH RULE 2.516
AND DESIGNATION OF E-MAIL ADDRESSES

Plaintiff(s), JANE DOE, by and through undersigned counsel, and pursuant to Fla. R. Judicial Administration 2.516, hereby designate(s) the following email addresses for receiving service of all court documents:

Counsel's Name(s): Todd Falzone, Esq.
Sean Parys, Esq.

Primary e-mail address: trf@kulaw.com
Secondary e-mail address: shp@kulaw.com
Secondary e-mail address: dina@kulaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was filed via the Florida Courts' e-Filing Portal on October 19, 2022, which will serve a true and correct copy also to be served with the Summons and Complaint.

Kelley | Uustal

Attorneys for Plaintiff
500 North Federal Highway, Suite 200
Fort Lauderdale, Florida 33301
Telephone: (954) 522-6601
Facsimile: (954) 522-6608

By: /s/ Todd R. Falzone, Esq.
Todd R. Falzone, Esquire, Esq.
Florida Bar No. 0975184

TRF/da

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO.: CACE-22-015601

JUDGE: SANDRA PERLMAN

JANE DOE,

Plaintiff,

vs.

FENIX INTERNET, LLC,
MICHELSON ROMELUS, and
BENDJY CHARLES,

Defendants.

S U M M O N S

THE STATE OF FLORIDA:

To All and Singular Sheriffs of said State:

YOU ARE HEREBY COMMANDED to serve this summons and copy of the Complaint
in this action on Defendant:

**FENIX INTERNET, LLC
501 SILVERSIDE ROAD, SUITE 87
WILMINGTON, DELEWARE 19809**

Each Defendant is required to serve written defenses to the Complaint or petition on
Todd R. Falzone, Esquire, **KELLEY | UUSTAL**, 500 North Federal Highway, Suite 200, Fort
Lauderdale, Florida 33301 within twenty (20) days after service of this summons on that
Defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk
of this Court either before service on Plaintiff's attorney or immediately thereafter. If a
defendant fails to do so, a default will be entered against that defendant for the relief demanded
in the Complaint or petition.

WITNESS my hand and the seal of this Court.

OCT 24 2022

As Clerk of said Court

By: _____

Deputy Clerk



Brenda D. Forman

IF YOU ARE A PERSON WITH A DISABILITY WHO NEEDS **BRENDA D. FORMAN** INFORMATION IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED, AT NO COST TO YOU, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT THE ADA COORDINATOR AT 201

SE 6 STREET, ROOM 136, FORT LAUDERDALE, FL 33310 OR TELEPHONE 954-357-6364 AT LEAST SEVEN (7) DAYS BEFORE YOUR SCHEDULED COURT APPEARANCE, OR IMMEDIATELY UPON RECEIVING THIS NOTIFICATION IF THE TIME BEFORE THE SCHEDULED APPEARANCE IS LESS THAN 7 DAYS; IF YOU ARE HEARING OR VOICE IMPAIRED, CALL 711.

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IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO.: CACE-22-015601

JUDGE: SANDRA PERLMAN

JANE DOE,

Plaintiff,

vs.

FENIX INTERNET, LLC,
MICHELSON ROMELUS, and
BENDJY CHARLES,

Defendants.

S U M M O N S

THE STATE OF FLORIDA:

To All and Singular Sheriffs of said State:

YOU ARE HEREBY COMMANDED to serve this summons, a copy of the Complaint, interrogatories, request to produce and notice of taking deposition in this action on Defendant:

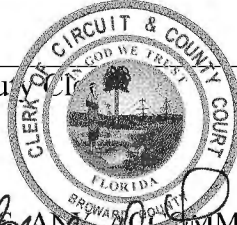
**BENDJY CHARLES
15455 NORTHEAST 6TH AVENUE, #308
MIAMI, FLORIDA 33162**

Each Defendant is required to serve written defenses to the Complaint or petition on , Esq., **KELLEY | UUSTAL**, 500 North Federal Highway, Suite 200, Fort Lauderdale, Florida 33301 within twenty (20) days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk of this Court either before service on Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the Complaint or petition.

WITNESS my hand and the seal of this Court.

OCT 24 2022

As Clerk of said Court

By: _____
Deputy Clerk

IF YOU ARE A PERSON WITH A DISABILITY WHO NEEDS AN ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED AT NO COST TO YOU, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT THE ADA COORDINATOR AT 201 SE 6 STREET, ROOM 136, FORT LAUDERDALE, FL 33310 OR TELEPHONE 954-357-6364 AT LEAST SEVEN (7) DAYS BEFORE YOUR SCHEDULED COURT APPEARANCE, OR IMMEDIATELY UPON RECEIVING THIS NOTIFICATION IF THE TIME BEFORE THE SCHEDULED APPEARANCE IS LESS THAN 7 DAYS; IF YOU ARE HEARING OR VOICE IMPAIRED, CALL 711.

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el numero del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podria ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO.: CACE-22-015601

JUDGE: SANDRA PERLMAN

JANE DOE,

Plaintiff,

vs.

FENIX INTERNATIONAL LIMITED,
MICHELSON ROMELUS, and
BENDJY CHARLES,

Defendants.

S U M M O N S

THE STATE OF FLORIDA:

To All and Singular Sheriffs of said State:

YOU ARE HEREBY COMMANDED to serve this summons, a copy of the Complaint, interrogatories, request to produce and notice of taking deposition in this action on Defendant:

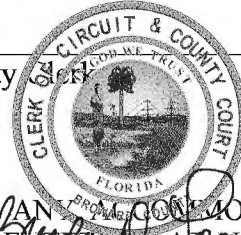
**MICHELSON ROMELUS
999 NORTHEAST 167TH STREET
NORTH MIAMI BEACH, FLORIDA 33162**

Each Defendant is required to serve written defenses to the Complaint or petition on Todd R. Falzone, Esquire, Esq., **KELLEY | UUSTAL**, 500 North Federal Highway, Suite 200, Fort Lauderdale, Florida 33301 within twenty (20) days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk of this Court either before service on Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the Complaint or petition.

WITNESS my hand and the seal of this Court.

As Clerk of said Court

By: _____
Deputy



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denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

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IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO.: CACE-22-015601

JUDGE: SANDRA PERLMAN

JANE DOE,

Plaintiff,

vs.

FENIX INTERNET, LLC,
MICHELSON ROMELUS, and
BENDJY CHARLES,

Defendants.

NOTICE OF UNAVAILABILITY

Please take notice that undersigned counsel will be unavailable to participate in the above-captioned matter on the following dates: December 12, 2022; December 23, 2022 through January 2, 2023; and January 24, 2023 through January 27, 2023.

Counsel respectfully requests that no trials, hearings, depositions, discovery or other matters be scheduled in this case during the above period.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on the 14th day of November, 2022, we electronically filed the foregoing via the Florida Courts e-Filing Portal.

Respectfully Submitted,

Kelley | Uustal
Co-Counsel for Plaintiff
500 North Federal Highway
Suite 200
Fort Lauderdale, Florida 33301
Telephone: (954) 522-6601
Facsimile: (954) 522-6608
trf@kulaw.com

By: /s/ Todd R. Falzone
TODD R. FALZONE
Florida Bar No. 0975184

TRF/dma